



April 15, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Review of Part 87 of the Commission's Rules Concerning the Aviation
Radio Service, WT Docket No. 01-289

Dear Mr. Caton:

Please accept this letter as the Reply Comments of Inmarsat Ventures plc in this proceeding.

Inmarsat has reviewed the FCC Notice of Proposed Rule Making (NPRM) in which it is proposed to consolidate, revise and streamline the FCC Part 87 rules (WT Docket No. 01-289) governing the Aviation Radio Service. Our comments relate to those areas of the NPRM specific to the provision of AMS(R)S, particularly Section II A and G. Inmarsat has recently developed specifications for a satellite service for aircraft that provides 64kbps data rates. While this new service is not currently supported by Part 87 regulations, we believe that changes to Part 87 to accommodate this new service would be appropriate.

We agree with the objectives set out in Section II.A.1 of the NPRM, specifically the incorporation of new material from the RTCA. We understand that avionics manufacturers have proposed minor changes of detail to the NPRM text based on RTCA document DO-210D change 1, and fully support their view that the two texts should be closely aligned.

On the general question raised (Section II.G) of whether the FCC should continue to designate specific emission types on aviation frequencies that are not shared with other services, or allow licensees to utilize any emission type in these frequencies if the transmitters meet the other applicable technical specifications, Inmarsat supports elimination of the designation of specific emission types as implicitly suggested in the question. In supporting this, Inmarsat notes that any evolved Inmarsat products would need to comply with **§ 87.139**

Emission limitations. (3). This will accommodate the rapid advances in digital communications that result in the introduction of new emission types into satellite communications systems on a regular basis. We further suggest that the wording in the footnote to 47 C.F.R part 80.204(d) which states “. . . that any emission type compatible with the Inmarsat system is acceptable . . .”, and note that this may be an appropriate formulation for use in Part 87.

Very truly yours,

/s/ Donald Kennedy
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